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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:
4 West Holdings, Inc. *et al.*,¹
Debtors.
§
§ Chapter 11
§
§ Case No. 18-30777 (HDH)
§
§ (Jointly Administered)

4 WEST HOLDINGS, INC. *et al.*,²
Plaintiffs,
v.
OMEGA HEALTHCARE INVESTORS, INC.
et al.,³
Defendants.
§
§
§ ADV. PRO. _____
§
§
§
§
§

¹ A list of the Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, is attached hereto as App. Ex. A at AAP 0018 – 0022.

² A list of the Plaintiffs in this adversary proceeding is attached hereto as App. Ex. B at AAP 0023 – 0025.

³ A list of the Plaintiffs in this adversary proceeding is attached hereto as App. Ex. C at AAP 0026 – 0028.

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, Plaintiffs 4 West Holdings, Inc. et al. (collectively “Plaintiffs” or “Debtors”) hereby move the Court for an order granting summary judgment against Defendants Omega Healthcare Investors, Inc. et al. (collectively “Defendants”) on Count I of the Complaint for Declaratory Judgment dated July 27, 2018. In accordance with Local Bankruptcy Rule 7056-1(c)(2) and Local Civil Rule 56.3(b), Plaintiffs state that each of the items required by Local Bankruptcy Rule 7056-1(c)(1) and Local Rule 56.3(a) are set forth in Plaintiffs’ Brief in Support of its Motion for Summary Judgment, filed concurrently herewith.

WHEREFORE, Plaintiffs respectfully request that this Court grant its Motion for Summary Judgment as a matter of law and granting such other and further relief as the Court may deem just and proper.

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Dated: July 27, 2018

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Andrew Zollinger

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